

# PhaseEleven

CONSULTANTS

January 26, 2011

Ms. Janet S. Baer, P.C.  
Baer Higgins Fruchtmann LLC  
111 E. Wacker Drive, Suite 2800  
Chicago, IL 60601-4277

Re: W.R. Grace Claims Objection: Neutocrete Document Production

Dear Jan:

Enclosed please find our invoice for services rendered from the period of December 1, 2010 through December 31, 2010 in the W.R. Grace Neutocrete document production matter.

We appreciate that your firm has a choice of service providers and will do everything we can to continuously exceed your expectations on price and quality of work.

Upon completion of your review, should you have any questions please don't hesitate to contact me at 312-878-3948 ext. 701.

Thank you very much for the opportunity to serve your client and firm.

Sincerely,



Claude W. Immis  
Senior Managing Director

Wire payments may be sent to the following account:

Bank Name: Bank of America  
Account Name: Phase Eleven Consultants, LLC  
Account #: 291007036174  
Routing #: 026009593

January 27, 2011

Mš. Janet S. Baer, P.C.  
 Baer Higgins Fruchtmann LLC  
 111 E. Wacker Drive, Suite 2800  
 Chicago, IL 60601-4277

**Billing Summary for Period:**  
**December 01, 2010 - December 31, 2010**

Total for services rendered	\$5,175.00
Total expenses	\$682.60
<b>Balance Due</b>	<b>\$5,857.60</b>

In Reference To: W.R. Grace Claims Objection: Neutocrete Document Production  
 Invoice #10014

Professional Services

<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/10/2010	CWI	Office conference with R. Higgins re assembly and preparation of document production files for Neutocrete claims litigation.	0.50	50.00
12/10/2010	CWI	Review, analyze and assemble Neutocrete document production compact discs for printout, assembly and distribution.	1.00	100.00
12/10/2010	DES1	Printout, assemble and organize Moeller text files for R. Higgins review re Neutocrete litigation document production; prepare and organize file folders re same for same; review and proof work.	9.50	475.00
12/10/2010	CWI	Review and attempt to open ".dat" files with various programs; consult with R. Kieper, M. Hidingen and J. Dully re same.	1.75	175.00
12/10/2010	CWI	Create Outlook database re Moeller email import and printout for Neutocrete document production; import Moeller cd into outlook database for data specialist for printout and assembly..	2.25	225.00
12/11/2010	DES1	Printout, assemble and organize Moeller text files for R. Higgins review re Neutocrete litigation document production; prepare and organize file folders re same for same; review and proof work.	11.75	587.50
12/11/2010	DES2	Retrieve, assemble and prepare Moeller email diligence files for R. Higgins review and Neutocrete document production; assemble and prepare file folders re same; review and proof work re same.	7.25	362.50
12/12/2010	DES1	Retrieve, assemble and prepare Moeller email diligence files for R. Higgins review and Neutocrete document production; assemble and prepare file folders re same; review and proof work re same.	7.25	362.50

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<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/12/2010	DES2	Retrieve, assemble and prepare Moeller email diligence files for R. Higgins review and Neutocrete document production; assemble and prepare file folders re same; review and proof work re same.	6.75	337.50
12/13/2010	CWI	Continue to review and attempt to open ".dat" files with various programs; consult with R. Kieper, M. Hidingier and J. Dully re same.	1.50	150.00
12/13/2010	DES1	Assemble, prepare, scan and organize paper copy files for Neutocrete document production; bates number same; review and proof work re same.	6.75	337.50
12/13/2010	DES2	Assemble, prepare, scan and organize paper copy files for Neutocrete document production; bates number same; review and proof work re same.	6.50	325.00
12/13/2010	CWI	Office conference with R. Higgins re distribution and review of Moeller cd text and email files for attorney review and production re Neutocrete document production.	0.50	50.00
12/14/2010	CWI	Office conference with R. Higgins re assembly, reproduction, bates label and reproduction of Moeller cd text and email files for attorney review and production re Neutocrete document production.	0.75	75.00
12/14/2010	DES1	Assemble, prepare, scan and organize Moeller cd text and email files paper copy files for Neutocrete document production; bates number same; review and proof work re same.	7.25	362.50
12/14/2010	DES2	Assemble, prepare, scan and organize Moeller cd text and email files paper copy files for Neutocrete document production; bates number same; review and proof work re same.	6.75	337.50
12/14/2010	CWI	Exchange correspondence with R. Higgins re additional files inclusion in Neutocrete document production.	0.25	25.00
12/16/2010	CWI	Exchange correspondence with R. Higgins re additional files inclusion in Neutocrete document production.	0.25	25.00
12/16/2010	CWI	Office conference with R. Higgins re distribution and review of Moeller cd files and email files for attorney review and production re Neutocrete document production.	0.75	75.00
12/16/2010	CWI	Final review and organization of Neutocrete document production files for distribution to R. Higgins.	2.75	275.00

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<u>Date</u>	<u>Init.</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/27/2010	DES1	Upload Neutocrete document production files to electronic dataroom document library for secure electronic access.	2.00	100.00
12/28/2010	DES1	Upload Neutocrete document production files to electronic dataroom document library for secure electronic access.	1.75	87.50
12/29/2010	DES1	Upload Neutocrete document production files to electronic dataroom document library for secure electronic access.	2.00	100.00
12/29/2010	CWI	Review, analyze and proof Upload of Neutocrete document production files to electronic dataroom document library for secure electronic access for accuracy.	1.75	175.00
For professional services rendered			89.50	\$5,175.00

Expenses :

<u>Date</u>	<u>Description</u>	
12/12/2010	Reproduction services re print out of 1246 Moeller text files for R. Higgins initial review at \$.10 per image for 1246 images.	124.60
12/14/2010	Reproduction services re print out and paper copy of 4830 Moeller text files for R. Higgins reference at \$.10 per image for 4830 images.	483.00
	Assemble and prepare five compact discs re Neutocrete document production of 4830 files at \$.15.00 per compact disc.	75.00
Total expenses		\$682.60
Total amount of this bill		\$5,857.60

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Claude Wm. Irmis	14.00	100.00	\$1,400.00
DES, I	48.25	50.00	\$2,412.50
DES, II	27.25	50.00	\$1,362.50